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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

January 10, 2003

Reply To
Attn Of: ECL-113

Ms. Kathleen Hain, Manager
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

Re: EPA Review of the December 2002 Draft Final Remedial Design/Remedial Action
Work Plan and Field Sampling Plan for the Operable Unit 4-13, CFA-04 Pond

Dear Ms. Hain,

EPA received the Draft Final RD/RA Work Plan and FSP on December 26, 2002. EPA comments on these documents are enclosed. One important issue that still must be resolved is the quality of the methyl mercury analysis data in support of the revised final remediation goal for mercury.

I look forward to resolving this issue during the comments resolution period. Please give me a call at (206) 553-0040 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Ivy".

Kathy Ivy
Remedial Project Manager

Enclosure

cc: Carol Hathaway, DOE-ID
Clyde Cody, IDEQ

**EPA January 2003 Comments on
the December 2002 Draft Final Remedial Design/Remedial Action Work Plan and
Field Sampling Plan for the Operable Unit 4-13 CFA-04 Pond**

Specific Comments

1. Page 5-3, Section 5.3.6: The first and second paragraphs of this section describe what the RRWAC covers in general and lists other documents that address ACM. But there is little description of the basic handling requirements for friable and non-friable ACM contained in the RRWAC and the other documents. The fourth paragraph of this section mentions the use of PPE in the event that non-roofing ACM is discovered but the type of required PPE is not listed in the work plan or in the remedial action field sampling plan. Some information is provided in the third paragraph concerning treatment of the material during excavation but additional information should be included concerning handling of friable and non-friable ACM to address worker safety during excavation and to address material transportation and disposal.

2. Page 5-4, Section 5.3.7, third category: The "Low-level, TCLP mercury contaminated soil" category will include soil from Zones 6A and 7A based on 1994 sampling, although the soil did not exceed TCLP during pre-remediation sampling. The results of pre-remediation sampling presented in Appendix D show that mercury concentrations in bordering Zones 5 and 8 and in one of the miscellaneous soil samples are higher or in the same range as Zones 6 and 7. Why is there not the same level of caution concerning possible TCLP mercury in these contiguous soils?

3. Page 5-8, Figure 5-1: This schedule identifies a date for the completion of the remedial action. However, this appears to be a working schedule with "early start" and "early finish" dates. An enforceable date needs to be identified for submission of the draft Remedial Action Report within 60 days of the final inspection.

4. Appendix B, Earthwork, Page 6 of 8, Soil Removal From Basalt Outcroppings: It was EPA's understanding following the last agency conference call that DOE would provide specifications for the performance of a vacuum cleaner that, if needed, would adequately remove soil from basalt cracks. A joint agency inspection as part of the prefinal inspection following excavation and removal of soils from basalt cracks/crevices and prior to demobilization from the field should be identified in the body of the work plan.

5. Appendix D, Section 4.1: This section needs to be updated to reflect the procedure used to analyze for methyl mercury in the soil samples. Detailed information needs to be provided from the lab concerning the quality of this data. There must be a written and document-controlled Standard Operating Procedure that provides all of the analytical handling of the samples through the analytical process. This must be in similar level of detail to the details presented in EPA Method 1630. If the results of these analyses are included in any reports or database systems, the results must be referenced back to the Standard Operating Procedure followed to generate the results.

6. Appendix E, Page E-8, Section E5, third paragraph: End-load dump trucks are identified for transport of waste intended for storage at the ICDF prior to soil treatment and disposal. Will the dump trucks be transporting loose soil which the ICDF can store prior to treatment or will the soils need to be containerized at CFA for storage at the ICDF prior to treatment? This needs to be clarified.

7. Field Sampling Plan, Page 3-7, Section 3.1.4.1, first paragraph: The Decision Statements seem to be associated with the incorrect geographical boundaries. Decision Statement 4 deals with contaminated soil in fractured basalt and Decision Statement 5 deals with calcine in bottles.

8. Field Sampling Plan, Page 4-1, Section 4.2.2, first paragraph: It is not clear how the randomly selected 30+ confirmation field samples will be distributed between the sides and bottoms of the excavated areas. There should be some minimum number of samples along each vertical face of an excavation to ensure that the horizontal extent of the contaminated soil in an zone has been removed.

9. Field Sampling Plan, Page 4-1, Section 4.2.1 & 4.2.4: These sections describe additional pre-remediation sampling that will occur in Zone 2A and sampling for waste disposition of calcine in bottles. Some additional information should be included to document the discoveries that led to expanding the scope of sampling. This information should also be provided in the body of the work plan which refers to design drawings of the expanded excavation area.

According to the field sampling plan, calcine in bottles will be tested for radionuclides. The description in the body of the work plan only refers to mercury with respect to sampling of the calcine. Is there an expectation that the calcine pellets will contain radionuclide contamination in addition to mercury?

11. Field Sampling Plan, Page 6-2, Section 6.1.4: The calibration curves for the field vs. lab sampling results should be included.